

TARGET SHEET

SITE NAME:	NON SITE SPECIFIC			
CERCLIS I.D.:	NONSITESPECI			
TITLE OF DOC.:	[REDACTED] INTEGRATED CONTINGENCY PLAN AND CORRESPONDENCE - HOUSTON FUEL OIL TERMINAL COMPANY - FRP-6-TX-00089			
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INTEGRATED CONTINGENCY PLAN

Prepared for HOUSTON FUEL OIL TERMINAL COMPANY Houston, Texas



Prepared by THE WCM GROUP, INC. Humble, Texas

Issued: June 2002 Last Revised: October 2015

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5.4.3. **Vulnerability Analysis**

The vulnerability analysis includes the following items:

· Calculation of the planning distance;

- Identification of all economic and environmentally sensitive areas, including drinking water intakes, that are located within the calculated planning distance;
- Response actions that the facility will employ to protect those identified areas from the effects of release of non-petroleum oil.

5.4.3.a. Calculation of the Planning Distance

The facility is located on the upper end of the Houston Ship Channel. The flow of the Channel and the original waterway, Buffalo Bayou, is tidally influenced. Therefore, the facility cannot utilize the Chezy-Maning equation to calculate the velocity component of the planning distance equation as found in Appendix C-III of 40 CFR 112. Furthermore, unlike releases calculated by the distance component of the planning distance equation, releases from the facility could go both downstream or upstream dependent upon the currents (tidal movements). The calculation of the planning distance is as follows:

$$d = (v) x (t) x (c)$$
; where

d = planning distance both downstream and upstream from a facility which an environmentally sensitive area could be injured or drinking water intake would be shutdown by a non-petroleum oil discharge (in miles)

v = velocity of the Houston Ship Channel x = time specified in Table 3, Appendix C-III, 40 CFR 112

c = constant conversion factor 0.68 sec. mile per hour-feet

And, the variables are assigned the following numerical values c = 0.68; therefore

 $d = (15) \times (1.0) \times (0.68)$

d = 10.2 miles.

However, as noted in the preamble to the final rule, since the facility is located in the tidally-influenced area, the actual facility planning is a total of 30 miles, 15 miles downstream of the facility (outgoing tide) and 15 miles upstream of the facility (incoming tide).

Attachment A includes Texas Coastal Oil Spill Planning and Response maps, which depict the area within a 15-mile radius from the facility center.

5.4.3.b. Identification Of Environmentally Sensitive Areas

Attachment A contains the Environmentally Sensitive Index Maps, or Situation Maps, for the Galveston Bay System. These maps indicate locations of environmental and anthropogenic importance within a 15 mile radius of the HFOTCO facility. Below are the Houston Ship Channel's sensitive areas at risk of contamination resulting from a worst-case discharge.

Environmental:

- Oil moving into Tuckers and Carpenter's Bayou.
- Oil moving into San Jacinto River/Burnett Bay.

Human Use:

- Water intake points on both sides of channel.
- Possible contamination of shoreline at Battleground Park.
- Possible disruption of operations at the Lynchburg ferry.

Industrial:

 Disruption of vessel traffic in and out of various facilities such as Rohm & Haas, Equity, Paktank, and Houston Fuel Oil, in addition to traffic heading further west into the Houston Ship Channel.

The Situation Maps contain numbered sites that indicate optimal locations for spill containment. Each site has an accompanying incident form that contains an overview of the site, relevant response information, containment strategies, and the priorities for environmentally-sensitive areas and archaeo-cultural and socioeconomic issues. Additionally, the forms can be used as an abridged version of the Discharge Information Report Form in Attachment C. These site-specific incident forms are located in Attachment A following their associated Situation Map.



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